

AUG 25 1999

**CERTIFIED MAIL**

**Return Receipt Requested**

Article No: P 165 405 776

Scott Loven, Health, Safety and  
Environmental Quality Manager  
Industrial Laminates  
665 Lybrand Street  
Postville, IA 52162-0977

Dear Mr. Loven:

RE: Industrial Laminates  
Postville, Iowa  
EPA RCRA ID No. IAD073489288

Letter of Warning

On July 28, 1998, representatives of the U. S. Environmental Protection Agency (EPA) inspected your facility. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA). A copy of that inspection report is enclosed.

I have reviewed the inspection report and have determined that violations of RCRA were documented. Enclosed is a list of violations. Please carefully read this list and correct these violations. While you are not required to submit anything at this time, you are responsible for correcting these violations. Please note that your correction of these violations does not prevent EPA from pursuing appropriate enforcement actions, including penalties, for violations discovered as a result of the inspection.

I would like to remind you that your facility is responsible for maintaining compliance with all applicable hazardous waste regulations. If there are any questions regarding this matter, please contact me at (913) 551-7883.

Sincerely,

Lynn M. Slugantz  
RCRA Enforcement and State Programs Branch  
Air, RCRA, and Toxics Division

Enclosures 2

cc: Joseph Obr, Iowa Dept. of Natural Resources



R00135836  
RCRA RECORDS CENTER

ARTD:SLUGANTZ:JMA:RESP:7928:23AUG99:H:ARTD/RESP/SLUGANTZ/INDUSTLAMINATESLOW.WPD				
RESP	RESP			
SLUGANTZ	HEIMAN			
<i>L. Slugantz</i>	<i>Heiman</i>			
<i>8/25/99</i>	<i>8/26/99</i>			

Industrial Laminates  
Postville, Iowa  
EPA ID Number: IAD073489288

### **List of Violations**

1. Title 40 of the Code of Federal Regulations (40 CFR) §262.34(a)(1)(i) which references 40 CFR 265.173 - Failure to keep containers of hazardous waste closed except when adding or removing wastes. At the time of the July 1998 inspection, drums of spent resin and solvent mixture in the Treater 90-Day Storage Area had open bung holes.
2. 40 CFR §262.34(a)(2) - Failure to date containers of hazardous waste. At the time of the inspection, drums of hazardous well water in storage in the Outside 90-Day Storage Shed did not have complete dates on the labels.
3. 40 CFR §262.34(c) - Failure to keep satellite accumulation containers of hazardous wastes closed. At the time of the inspection, drums in the Still Room Satellite Accumulation Area had open bung holes.
4. 40 CFR §262.34(a)(4) which references 40 CFR §265.16(e) - Failure to maintain training records until closure of the facility or 3 years from date employees last worked at the facility. At the time of the inspection, proof of personnel training could only be provided for the calendar year 1998. Training records for past years could not be provided.

### **Potential Violation**

1. At the time of the July 1998 inspection, it does not appear from the documentation provided to the inspector, that weekly inspections of the hazardous waste storage area were being performed, as required by 40 CFR §262.34(a)(1)(i) which references 40 CFR §265.174. This will be further investigation during future inspections of your facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
901 N. 5TH STREET  
KANSAS CITY, KANSAS 66101

AUG 2 5 1999

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Postville, IA 52162-0977

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Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

- I also wish to receive the following services (for an extra fee):
1. ☐ Addressee's Address
  2. ☐ Restricted Delivery
- Consult postmaster for fee.

**3. Article Addressed to:**

Scott J. Foxon, Health, Safety  
and Environmental Quality  
Manager  
Industrial Laminates  
605 Skyward St.  
Peotville, IA 52162-0977

**4a. Article Number**

P 165 405 776

**4b. Service Type**

- ☐ Registered  
☐ Express Mail  
☐ Return Receipt for Merchandise ☒ COD

**7. Date of Delivery**

**8. Addressee's Address (Only if requested and fee is paid)**

PO Box 977

**5. Received By: (Print Name)**

Scott J. Foxon

**6. Signature: (Addressee or Agent)**

PS Form 3811, December 1994

Domestic Return Receipt

Thank you for using Return Receipt Service.

P 165 405 776

US Postal Service  
**Receipt for Certified Mail**  
No Insurance Coverage Provided.  
Do not use for International Mail (See reverse)

Sent to		Industrial
Street & Number		Laminates
Post Office, State, & ZIP Code		
Postage	\$	
Certified Fee		
Special Delivery Fee		
Restricted Delivery Fee		
Return Receipt Showing to Whom & Date Delivered		
Return Receipt Showing to Whom, Date, & Addressee's Address		
TOTAL Postage & Fees	\$	
Postmark or Date		IAD073489 288

PS Form 3800, April 1995